



Governor's Advisory Council for Exceptional Citizens (GACEC) 516 West Loockerman St., Dover, DE 19904
302-739-4553 (voice) 302-739-6126 (fax) <http://www.gacec.delaware.gov>

August 29, 2019

Nicole Cunningham
Planning, Policy & Quality Unit
Division of Medicaid & Medical Assistance
1901 N. DuPont Hwy. P.O. Box 906
New Castle, DE 19720-0906

RE: DSS Proposed Regulation on Purchase of Care – Determining and Reviewing Child Care [23 DE Reg. 98 (August 1, 2019)]

Dear Ms. Cunningham:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Delaware Health and Social Services (DHHS)/Division of Social Services (DSS) proposal to amend the DSS manual regarding Purchase of Care (POC). The proposed amendment specifically amends 16 DE Admin. Code §11004.11 to align with federal requirements mandated by the Child Care Development Block Grant (45 CFR §98.21). Council **endorses** the additional protections provided by the policy amendments.

First, the amendment requires 12-month authorizations for every eligible family and removes the requirement of a six-month interim report. This provides greater stability for eligible recipients and ensures that they will continue to receive assistance for 12 months unless their case is closed.

Second, the amendment prohibits increasing copayments during the eligibility period. The childcare copayment will decrease when there is a decrease in the family's income reported and cannot increase beyond the initial copayment amount during the authorization period if there is an increase in a family's income.

Lastly, the amendment requires authorization of an additional 90 days of childcare in the event of a loss of need of assistance during the eligibility period. The amendment allows a family to remain eligible and authorized for childcare until their next review if the family regains a need

for services before the 90 days end. Each of these changes is consistent with federal requirements.

Thank you for your consideration of our endorsement. Please contact me or Wendy Strauss at the GACEC office if you have any questions.

Sincerely,

Ann C Fisher

Ann C. Fisher
Chairperson

ACF:kpc